

November 22, 2022

SUBJECT: FOIA REQUEST

Omega Chemical Superfund Site (OU2)
Whittier/Santa Fe Springs, California

To Whom it May Concern:

On behalf of the Joint Defendant Group, S.S. Papadopoulos & Associates, Inc. (SSP&A) has prepared this Freedom of Information Act (FOIA) Request regarding Operable Unit 2 (OU2) of the Omega Chemical Superfund Site at 12504-12512 Whittier Boulevard in Whittier, California.

This request is a supplement to a prior FOIA request submitted to the US Environmental Protection Agency (USEPA) by The Source Group, Inc. on January 30, 2015, and assigned Request No. EPA-R9-2015-003778. This FOIA request specifically seeks the following:

- A.** All CERCLA 104 (e) responses, data, correspondence or other information relating to the Omega Chemical Site and/or Operable Unit 2 (OU2) received since January 2015.
- B.** The full report prepared by Intera on behalf of the Settling Work Defendants entitled *The Final Groundwater Flow Model Predictive Simulations Report*, and any associated correspondence, data, reports, calculations, computer models – including input files and output files - or other digital data or hard media.
- C.** Any correspondence, reports, data, models, calculations, or other digital data submitted since January 2015 regarding the proposed OU2 remedy.
- D.** Any correspondence, reports, data, models, calculations, or other digital data related to the March 18, 2020 Hargis + Associates, Inc report that was completed on behalf of the Settling Work Defendants and entitled, "Pre-Design Investigation Evaluation Report, Northern Extraction and Central Extractions Areas, OU2"
- E.** Any correspondence, data, reports, calculations, computer models or other digital data or hard media produced since January 2015, regarding:
 - USEPA's groundwater model and any other groundwater model[s] or calculation[s] regarding or relating to groundwater in OU2;
 - Groundwater gradients and flow rates and any other OU2 groundwater characteristics;
 - Tests to identify subsurface hydraulic characteristics including but not limited to aquifer (pumping) tests, slug tests, tracer tests;
 - Tests to identify subsurface chemical transport characteristics including but not limited to FOC (fraction of organic carbon) and the mineral content of soils including but not limited to ferromagnesian minerals;
 - Data, calculations, information, or correspondence regarding background concentrations of constituents in soil and groundwater that are listed as contaminants of concern (COCs) for OU2;

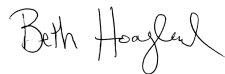
- Data, calculations, information, or correspondence regarding the movement of contaminants in groundwater in OU2, including but not limited to the movement of contaminants in groundwater from the Omega Chemical site (OU1) or any other site in OU2;
- Any stable isotope studies or other studies used to evaluate OU2 groundwater, including plume source differentiation;
- Any analysis of the mass of contaminants originating from any site within OU2;
- Any estimates of the mass of contaminants present in groundwater within OU2
- Any allocation formulas, proposals or models related to OU2; and,
- All groundwater monitoring data collected or provided on behalf of OPOG including water levels and water quality sample results.

F. All consent decrees, administrative orders, or other orders, settlements or agreements since January 2015 concerning potentially responsible parties other than the Settling Work Defendants or its members that received contribution protection related to OU2.

CLOSING

We appreciate your assistance with this project. Please do not hesitate to contact me via email or phone at the information provided below if you have any questions or comments.

Sincerely,



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